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Attorneys for Defendant
CITY OF SAN LEANDRO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

INTERNATIONAL CHURCH OF THE
FOURSQUARE GOSPEL

Plaintiff,

v.

CITY OF SAN LEANDRO, TONY
SANTOS (in his official capacity),
SURLENE G. GRANT (in her official
capacity), DIANA M. SOUZA (in her
official capacity), JOYCE R.
STAROSCIAK (in her official capacity),
BILL STEPHENS (in his official capacity),
JIM PROLA (in his official capacity),
JOHN JERMANIS (in his official and
individual capacities), DEBBIE POLLART
(in her official and individual capacities),
DOES 1-50.

Defendants.

Case No. C 07-03605 PJH

**STIPULATION FOR EXTENSION
OF EXPERT DISCLOSURE DATES
AND EXPERT DISCOVERY
CUTOFF**

[Civil L.R. 6-2]

Honorable Phyllis J. Hamilton
Complaint Filed: 7/12/07
Trial Date: Not Yet Set

1 FAITH FELLOWSHIP FOURSQUARE
2 CHURCH,

3 Real Party in Interest
4

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6 IT IS HEREBY STIPULATED and agreed by all parties, as authorized by their respective
7 counsel, that the date for expert disclosure by Plaintiff International Church of the Foursquare
8 Gospel ("ICFG") be extended to June 15, 2008, that the date for expert disclosure by Defendant
9 City of San Leandro ("City") be extended to June 30, 2008, and that the corresponding expert
10 discovery cutoff be moved to July 30, 2008.

11 The extension for disclosing experts and reports is necessary due to the parties' ongoing
12 settlement discussions. Plaintiff did not disclose any experts on April 30, 2008. As a result of
13 ongoing settlement discussions, and the time needed for the parties, and their governing boards,
14 to consider certain offers and counteroffers, the City directed its retained expert to hold off on
15 further work to avoid unnecessary costs. As of May 5, 2008, settlement discussions ground to a
16 halt, and the City was faced with the need to prepare for disclosure of its expert and his report on
17 May 15, 2008, which is too tight of a turnaround for the City's expert to complete his report.

18 If expert disclosure is pushed out, the parties agree that the expert discovery cutoff should
19 also be extended thirty days, to July 30, 2008, to allow for disclosure of rebuttal experts, if any,
20 in accordance with Fed. R. Civ. P. 26(a)(2)(C)(ii).

21 The City's deadline for filing/serving a motion for summary judgment/adjudication is
22 August 27, 2008. Expert discovery will be completed before this date. The parties agree that
23 Plaintiff may take the deposition of the City's expert and the City will make its expert available
24 for deposition before August 27, 2008.

25 The parties have no reason to believe that the modest extension provided for herein will in
26 any way delay trial.

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1 Counsel for all parties have and will continue to cooperate with each other and the Court
2 to secure any changes to the proposed dates below:

- 3 ■ Expert disclosure by Plaintiff: June 15, 2008
- 4 ● Expert disclosure by Defendant: June 30, 2008
- 5 ● Expert discovery cutoff: July 30, 2008

6 IT IS SO STIPULATED.

7 DATED: May 7, 2008

8 By: 

9 Kevin T. Snider
10 PACIFIC JUSTICE INSTITUTE
11 Attorneys for Plaintiff and Real Party in Interest
12 INTERNATIONAL CHURCH OF THE
13 FOURSQUARE GOSPEL and FAITH
14 FELLOWSHIP FOURSQUARE CHURCH

13 DATED: May 8, 2008

14 By: /s/

15 Deborah J. Fox
16 MEYERS, NAVE, RIBACK, SILVER &
17 WILSON
18 Attorneys for Defendants
19 CITY OF SAN LEANDRO
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